

**United States District Court**  
**District of Massachusetts**  
**Western Division**

**TRIF Company**  
**Plaintiff**

**V.**

**Chris Morris d/b/a International Housewares,**

**Frank Stoegarar d/b/a Worldwide Marketing,**

**Zia Biao Xu and Zhi Xiong Xu d/b/a Earth Link**

**LLC**

C.A. No. -04-

30194-MAP

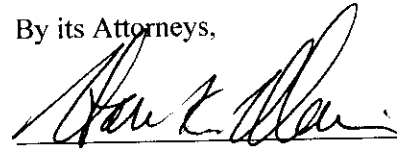
**PLAINTIFF TRIF COMPANY'S EMERGENCY MOTION FOR RESTRAINING ORDER AND**  
**PRELIMINARY INJUNCTION**

Now comes the Plaintiff TRIF Company to move for a Restraining Order and Preliminary and Permanent Injunction against the above-named Defendants from selling a line of products copied from Plaintiff's line, with nearly identical trade dress, at the Big Exposition currently being held in Springfield, Massachusetts only until October 3, 2004. The sale of the Defendants' copycat product and virtually identical trade dress are causing irreparable harm to the Plaintiff's customer base, reputation for quality and competitive prices, as well as an incalculable loss of business. Emergency relief is sought because of the immediate and irreparable harm to Plaintiff and because the parties are specialty retailers who constantly move to new sales venues and who will only be doing business in the Commonwealth until the end of September. Unless the sale of the infringing products is halted in Massachusetts, it may be repeated in several other jurisdictions.

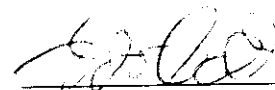
Plaintiff TRIF Company respectfully requests an immediate hearing for the reasons set forth in the accompanying memorandum of law in support of TRIF Company's Emergency Motion for Restraining Order and Permanent and Preliminary Injunction.

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2 Respectfully submitted by,  
3 Plaintiff,

4 By its Attorneys,

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